

October 9, 2001

Ms. Dorothy Attwood
Chief, Common Carrier Bureau
Federal Communications Commission
445 12th St., SW
Washington, D.C. 20554

**Re: Changes to Toll-Free Number Administration System
CC Docket No. 95-155 and NSD File No. L-01-112**

Dear Ms. Attwood:

On September 6, 2001, the undersigned representatives of AT&T, Sprint, and WorldCom, met with you and other members of the Common Carrier Bureau to discuss proposed changes to the centralized toll-free database, public interest concerns, and compliance with existing rules as generally set forth in comments submitted pursuant to the Commission's Public Notice released June 22, 2001 (DA 01-1463). During that meeting, we pointed out that the absence of any record detailing the Commission's concerns or alleged complaints made it virtually impossible to propose alternatives to the Keller-Wade Letter (December 7, 2000, DA 00-2754) the Commission would find satisfactory. Additionally, we noted that the record created in response to the June 22nd Public Notice evidenced a lack of support for the changes proposed in the Keller-Wade letter. We recommended that the Commission hold a public workshop at which Commission staff would present a detailed description of their concerns to industry subject matter experts. Those experts could then work cooperatively with the Commission to find cost-effective ways to address its concerns.

We came away from the meeting with the clear impression that you viewed the proposed workshop approach favorably and would direct Bureau staff to schedule such a forum. To date, however, no such forum has been scheduled, and it is our impression from speaking with Network Services Division staff that the forum approach to this matter is no longer under consideration. Indeed, we have been advised that the proposed changes embodied in the Keller-Wade letter (or some variation thereof) would likely be implemented unless the industry provided a satisfactory alternative means of preventing customer-to-customer transfers of toll-free numbers.

We view this situation with grave misgivings, and believe that such an approach is replete with legal and procedural infirmities. At this point in time, the industry still does not have any information detailing the problems the Keller-Wade letter was intended to solve. Indeed, the record is utterly devoid of any solid data supporting the need for the type of changes mandated by the Keller-Wade letter. Since none of the comments filed in this proceeding contained information detailing concerns with current toll-free operations, no alternative approaches can be constructed, considered, or evaluated until

the Commission shares its detailed concerns with industry experts. What is clear is that the approach proposed in the Keller-Wade letter would cause substantial inconvenience, cost and harm to toll-free service subscribers, and would require significant and expensive changes to RespOrg systems and practices, all to address an as-yet undefined problem.

AT&T, Sprint, and WorldCom again offer our assistance to the Commission. Our technical experts are prepared to work with Commission staff to find cost-effective solutions to problems that may exist today with the toll-free system. To do so, we must first understand the nature and scope of those problems. We urge the Commission to schedule a workshop as was discussed in the September 6 meeting.

Sincerely,

James Grudus
AT&T
(908) 221-6630
295 N. Maple Ave.
Basking Ridge, NJ 07920

Norina Moy
Sprint
(202) 585-1915
401 9th St. NW, Suite 400
Washington, DC 20004

Henry Hultquist
WorldCom
(202) 736-6485
1133 19th St., NW
Washington, DC 20036

c: Diane Harmon, FCC
Jennifer Gorny, FCC
Scott Bergmann, FCC